

Appendix A
Trial Exhibits Subject to Non-Party Frontier's Motion to Impound

Exhibit #¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
17	FRONTIER-000550 – FRONTIER-000557	Pg. 553-556, portion of pg. 557	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans; Pricing Strategy
		Portion of pg. 557	Opposed by DOJ	Granular Financial Data; Future Plans and Strategy, including Network Plans; Pricing Strategy
19	FRONTIER- DIVCID-000013 – FRONTIER- DIVCID-000016	Pg. 14	Unopposed	Confidential Contract Terms
196	FRONTIER-CID- 000006517 – FRONTIER-CID- 000006533	Pg. 3-5, 7-8, 11-13	Unopposed	Future Plans and Strategy, including Network Plans

¹ Exhibit numbers are based on the Proposed Final Pretrial Order [Dkt. Nos. 191, 191-3, 191-4].

Exhibit #¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
AID	FRONTIER-000812 – FRONTIER-000842	Pg. 819, 823, 824, 825	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans
AM	B6NK-CM-00017945 - B6NK-CM-00018755 (Letter from A. Devlin to C. Brader Leuchten, March 31, 2022)	Pg. 4	Unopposed	Granular Financial Data
BFW	FRONTIER-000029 – FRONTIER-000032	Pg. 2-4	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans; Pricing Strategy
BFX	FRONTIER-000033 – FRONTIER-000040	Pg. 2, 4-8	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans; Pricing Strategy
BFY	FRONTIER-000048 – FRONTIER-000067	Pg. 5-6, 8-9, 11-12, 14, 16, 18, 20	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network

Exhibit #¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
				Plans; Pricing Strategy
BFZ	FRONTIER-000130 – FRONTIER-000143	Pg. 2-6, 9-11,	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans; Marketing Strategy; Pricing Strategy
BGA	FRONTIER-000250 – FRONTIER-000274	Pg. 3-15, 17-25	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans
BGB	FRONTIER-000306 – FRONTIER-000346	Pg. 4-7, 12-14, 16-18, 20-30, 32-34, 36-37, 39-41	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans; Pricing Strategy
BGC	FRONTIER-000347 – FRONTIER-000359	Pg. 1-10	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans; Pricing

Exhibit #¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
				Strategy; Marketing Strategy
		Pg. 836	Opposed by DOJ	Granular Financial Data; Future Plans and Strategy, including Network Plans
BGD	FRONTIER-CID-000013133 – FRONTIER-CID-000013136	Pg. 3-4	Unopposed	Future Plans and Strategy, including Network Plans
BGE	FRONTIER-CID-000014067 – FRONTIER-CID-000014076	Pg. 4, 6-10	Unopposed	Granular Financial Data; Future Plans and Strategy, including Network Plans; Pricing Strategy
BGF	FRONTIER-CID-000018516 – FRONTIER-CID-000018534	Pg. 3-4, 6, 8-9, 11-14, 16	Unopposed	Granular Financial Data; Strategic Plans, including Network Plans; Pricing Strategy; Marketing Plans

Exhibit #¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
BNF	B6NK-CM-0014766 – B6NK-CM-00014788	Entirety ²	Opposed by Defendants	Future Strategic Plans, including Network Plans
CF	FRONTIER-DIVCID-000145 – FRONTIER-DIVCID-000145	Pg. 145	Unopposed	Confidential Contract Terms; Strategic Plans and Valuation of Slots
CG	FRONTIER-VOL-0001196 – FRONTIER-VOL-0001212	Pg. 1200, 1201	Opposed by DOJ	Granular Financial Data; Strategic Plans, including Network Plans; Pricing Strategy
		Pg. 1205	Unopposed	Granular Financial Data; Strategic Plans, including Network Plans; Pricing Strategy
CH	FRONTIER-VOL-0001512 – FRONTIER-VOL-0001538	Pg. 1514, 1515	Opposed by DOJ	Granular Financial Data; Strategic Plans, including Network Plans; Pricing Strategy

² Frontier received notice that Defendants intend to use this document at trial on September 29, 2023, a few hours before this filing was due. For now, Frontier moves to impound this document in its entirety, but will address any further issues of confidentiality at any future court hearing.

Exhibit #¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
		Pg. 1516	Unopposed	Granular Financial Data; Strategic Plans, including Network Plans; Pricing Strategy
CI	FRONTIER-VOL-0001764 – FRONTIER-VOL-0001788	Pg. 1767, 1768, 1769	Unopposed	Granular Financial Data; Strategic Plans, including Network Plans; Pricing Strategy
		Pg. 1770	Opposed by DOJ	Granular Financial Data; Strategic Plans, including Network Plans; Pricing Strategy
CJ	FRONTIER-VOL-0001858 – FRONTIER-VOL-0001871	Pg. 1859, 1860, 1862, 1863, 1864, 1855, 1867, 1868	Unopposed	Granular Financial Data; Strategic Plans, including Network Plans
WD	CID Deposition Transcript of Barry Biffle (Mar. 2, 2023)	85:20-15, 86:3, 86:6-16, 86:6-87, 93:4-11, 93:22-94:7, 94:9-95:4, 95:17-96:19, 96:21, 96:22-23, 971-6, 106:9, 106:16-107:25, 108:3-109:10, 115:19-20, 115:20-21,	Unopposed	Future Strategic Plans, including Network Plans; Competitive Strategy; Pricing Strategy; Granular Financial Information

Exhibit # ¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
		115:23-24, 125:12, 125:25, 131:1-8, 131:10-11, 131:15-122:1, 136:11, 136:14-19, 136:20, 136:25, 148:10-20, 148:24, 149:9-10		
		84:14-85:19, 86:1-2, 86:4-5, 87:1-6, 88:1, 87:20-93:3, 93:12-21, 94:8, 95:11-17, 96:20-21, 96:21-22, 96:24-97:1, 97:7-9, 98:2-9, 103:15-104:19, 105:25-106:9, 106:9-15, 108:1-3, 114:8-115:19, 115:21-23, 115:25-116:2, 117:13-120:11, 120:17-121:7, 123:21-125:11, 125:13-24, 126:1-17, 130:24-131:1, 131:9-10, 131:12-15, 134:11-135:7, 135:15-136:11, 136:11-13, 136:20, 136:20-15, 136:25-137:1, 140:21-142:20, 148:8-9, 148:21-24,	Opposed by DOJ	Future Strategic Plans, including Network Plans; Competitive Strategy; Pricing Strategy; Granular Financial Information

Exhibit #¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
		148:25-149:9, 149:10-25, 150:5-15, 162:1-165:14, 112:3-6		
N/A ³	File named "master_planner.xlsx" provided with Frontier's May 19, 2022 Spec 2g-i Sample response	Entire Spreadsheet	Unopposed	Granular Financial Data; Data on Future Network Plans
N/A	Litigation Deposition Transcript of Barry Biffle (June 14, 2023)	42:15, 42:21, 42:24, 43:9, 43:12-17, 43:19, 43:21-44:6, 44:22, 44:25-45:4, 48:6, 48:8-9, 50:10-11, 50:13-24, 53:17-18, 53:20-21, 60:17-61:4, 61:9-12, 61:15-17, 61:24, 62:1-16, 63:1, 63:4-16, 63:20, 64:1-3, 64:9-22, 64:15-65:1, 81:11-13, 81:25-82:1, 82:13-16, 82:24-4, 83:10-11,	Unopposed	Future Strategic Plans, including Network Plans; Competitive Strategy; Pricing Strategy; Granular Financial Information

³ "N/A" refers to exhibits that the parties indicated they may use at trial but that do not appear in the Proposed Final Pretrial Order [Dkt. Nos. 191, 191-3, 191-4]. Out of an abundance of caution, Frontier requests impounding of these exhibits in the event they are used at trial.

Exhibit # ¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
		83:13-17, 105:23, 106:1, 106:4, 106:7-13, 107:1, 107:5, 107:10, 112:3-6, 112:7-10, 112:16-113:1, 113:11-13, 136:11-12, 136:12-13, 138:14-139:2, 139:7-8, 154:20, 160:10-17, 169:19-171:1, 172:4-10, 175:1-7		
		29:10-16, 38:19-40:20, 40:24-41:3, 41:19-42:15, 42:19-21, 42:22-24, 42:25-43:8, 43:10-12, 43:18-19, 43:19-20, 44:7-21, 44:23-24, 45:5-14, 45:19-46:15, 46:24-47:13, 48:3-5, 48:7, 48:21-49:13, 50:6-9, 50:12-13, 50:25-52:10, 53:15-17, 53:19, 60:14-16, 61:5-8, 61:13-14, 51:18-23, 61:25, 62:17-25, 63:2-3, 63:17-19, 63:21-25, 64:4-7, 64:23-24, 80:23-81:11, 81:14-	Opposed by DOJ	Future Strategic Plans, including Network Plans; Competitive Strategy; Pricing Strategy; Granular Financial Information

Exhibit # ¹	Description	Portion to Redact	Opposition by Parties	Frontier's Basis for Motion to Seal
		24, 82:1-2, 82:5-12, 82:17-23, 83:5-10, 83:11-12, 83:19-84:20, 105:22-23, 105:23-106:1, 106:2-4, 106:5-6, 106:25-107:1, 107:2-107:5, 107:5-9, 107:11-14, 109:4-15, 109:18-24, 111:22-112:3, 112:7, 112:11-16, 113:2-11, 122:3-14, 123:22-124:1, 134:2-136:10, 136:12, 138:10-13, 139:3-7, 149:1-149:18, 151:17-21, 152:10-154:19, 159:13-160:5, 160:8-9, 160:18-161:4, 166:14-22, 168:25-169:18, 171:2-172:3, 172:11-14, 174:7-13, 174:18-25, 179:13-23, 186:7-24, 187:7-11		
N/A	Frontier Ancillary Fee and Ticket Fare Data Produced to DOJ	Entirety	Unopposed	Granular Financial Data and Pricing Data